

MEMO ENDORSED

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May 15, 2024

Hon. Nelson S. Roman
 United States District Court
 300 Quarropas Street
 White Plains, New York 10601

re: United States v. Fray (Anthonio Randall), 24-cr-67-03 (NSR)

Dear Judge Roman:

This letter is an application to modify Mr. Randall's bail conditions to permit him to travel to Columbia, South Carolina, to attend a kindergarten graduation ceremony for his son, who resides there with the child's mother. He requests permission to do so from May 22 to May 26, 2024, including air travel back and forth. He would be staying at a hotel in Columbia. The date of the graduation is May 23.

Mr. Randall's bail conditions include home detention enforced by GPS monitoring. He has been granted exceptions, including employment, religious services, health services, appointments with counsel, and various personal needs approved by the pretrial services office.

I have contacted government counsel and the pretrial services office about this request. I do not currently know the position of government counsel, but I am advised by USPTO Marlon Ovalles that their office does not consent to the request. Officer Ovalles advises that the pretrial services office "does not consent to overnight travel or social requests for individuals subject to Home Detention", although Officer Ovalles notes that Mr. Randall "remains in compliance with the conditions of his release." Mr. Randall remains employed with a company that provides services to disabled adults.

Very truly yours,

/s/ *Theodore S. Green*
 Theodore S. Green

cc: All counsel (by ECF)
Marlon_Ovalles@nyspt.uscourts.gov
Francesca_Piperato@nyspt.uscourts.gov

Deft's request for temporary bail modification is DENIED as Deft's Pretrial Officer does not consent. The Clerk of Court is requested to terminate the motion at ECF No. 20. Dated: White Plains, NY

May 16, 2024

SO ORDERED:

[Signature]
 HON. NELSON S. ROMAN
 UNITED STATES DISTRICT JUDGE

USDC SDNY
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